

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Civil No. 1:11CV00641 (LO/TCB)
)	
4219 UNIVERSITY DRIVE,)	
FAIRFAX, VIRGINIA,)	
)	
and)	
)	
\$28,534.22 IN FUNDS SEIZED FROM PNC)	
BANK ACCOUNT NO. ENDING IN 4269,)	
)	
Defendants.)	

PIAINTIFF'S REVISED EXHIBIT LIST

The United States, by and through its attorneys, hereby files a revised exhibit list for trial:

Exhibit No.	Description	Admitted	Offered
1	Deed from Joseph Adams to Turan & Duygu Kivanc dated July 2, 1993 for 4219 University Drive (Bates Range: 082598-082599)		
2	Deed from Turan & Duygu Kivanc to Mert Kivanc dated September 27, 2005 for 4219 University Drive (Bates Range: 082601-082602)		
3	\$288,000 mortgage loan to Mert Kivanc for 4219 University Drive (Bates Range: 082604-082622)		

4	\$100,000 credit line deed of trust to Mert Kivanc (Bates Range: 082624-082630)		
5	Approximately \$270,000 in checks from Mert Kivanc in 02/2007-03/2007 paying off his mortgage on 4219 University Drive (Bates Range: 082631-082643)		
6	Certificate of Satisfaction filed April 16, 2007 on Mert Kivanc's \$288,000 mortgage loan (Bates Range: 082644)		
7	Regional Sales Contract between Mert Kivanc, Turan Kivanc and Duygu Kivanc dated May 10, 2007 (Bates Range: 082648-082657)		
8	Deed from Mert Kivanc to Turan & Duygu Kivanc dated May 30, 2007 for 4219 University Drive (Bates Range: 082646-082647)		
9	Two \$300,000 cashier's checks from BFSFCU bank account that were redeposited to BFSFCU in May 2007 (Bates Range: 082658-082659)		
10	Corresponding May 2007 bank statements of Turan & Duygu Kivanc from BFSFCU (Bates Range: 082662-082664)		
11	Two \$325,000 cashier's checks from PNC Bank account that were redeposited in PNC Bank in May and June 2007 (Bates Range: 082660-082661)		
12	Corresponding May/June 2007 bank statements from PNC Bank (Bates Range: 082665-082668)		
13	PNC Bank & BFSFCU bank records/wire detail showing money wired to Turkey in May and June 2007 (Bates Range: 082669-082671)		

14	August 9, 2010, Notice of Default on \$100,000 line of credit (Bates Range: 082673-082674)		
15	October 9, 2010, Certificate of Satisfaction on \$100,000 credit line (Bates Range: 082675)		
16	\$580,750 in checks from Mert Kivanc to Turan Kivanc between 11/2006-5/2007 (Bates Range: 082677-082684)		
17	\$483,185.50 in checks from Mert Kivanc to Turan Kivanc between 11/2006-4/2007 (Bates Ranges: 082676; 082685-082690)		
18	Approximately \$470,000 in checks from 02/2007 - 03/2008 from Mert Kivanc for the renovation/reconstruction of 4219 University Drive (Bates Range: 082474-082541)		
19	Renovation and Restoration ledger for 4219 University documenting payments of costs between 02/2007-03/2008 (Bates Range: 082542-082547)		
20	City of Fairfax Permits/Soil Erosion records related to 4219 University Drive (Bates Ranges: 041005-041057; 082548-082550)		
21	Renovation/Construction records from Michael Daughtry related to the demolition and construction of 4219 University Drive (Bates Range: 024007-024564)		
22	Mert Kivanc Bankruptcy filing from December 2009 (Hard copy provided)		

23	<p>Remicade supply records from: Oncology Therapeutics Network (Bates Range: 037070-037074)</p> <p>Florida Infusion (Bates Range: 036812-036827) McKesson (Bates Range: 037077-037105; hard copy of additional single page provided) Express Scripts/Curascript/Priority Healthcare (Bates Range: 037108-037170)</p>		
24	Remicade supply and billing records from Mert Kivanc (Bates Range: 023463-024006)		
25	<p>Remicade supply companies with no sales recorded to Mert Kivanc:</p> <p>Amerisource/Bergen (Bates Range: 037066-037067) Accredo/NovaFactor (Bates Range: 085064) Cardinal Health (Bates Range: 085066)</p>		
26	Remicade superbills for Mert Kivanc (Bates Range: Various within 016056-060673 (hard copies provided)		
26-1	D. Bollware Superbill (Bates Range: 032070-71)	FR Depo 01/05/12	
26-2	J. Dyson Superbill (Bates Range: 060588-89)	FR Depo 01/05/12	
27	Infusion spreadsheets prepared by Khoa Nguyen 04/2006-06/2006 (Bates Range: 077009-077028)		
28	<p>Remicade billing and payment records from the following health benefit plans relating to Mert Kivanc's medical practice for dates of service 11/1/2005 - 10/31/2007:</p> <p>Aetna (Bates Ranges: 040989-041004; 082454-082469; 082787-082966) Anthem BlueCross BlueShield (Bates Range: 040949-040987; 082970-083616) CareFirst BlueCross BlueShield (Bates Range: 036798 (Spreadsheets on this CD named "STARS FBI JUN 06-Mar 09 (C) F_" and "carefirst1(c)F"; 040881; 040883-040948; 083618-084491)</p>		

	Cigna (Bates Ranges: 085090-085092; 085102-085163; 085165; 085180-085340) Medicaid (Bates Range: 081144-081790) Medicare (Bates Range: 036789 (Spreadsheet on this CD named "Medicare1 (C) FF_" - password for spreadsheet is "FRuq85Un"); 061434-061633; 084493-084847) United Healthcare (Hard copies provided on 12/13/2011; 036789 (Spreadsheet on this CD named "r_UNET DATA PULL FF_"		
28-1	J. Dyson EOB Aetna (Bates Range: 082931)	FR Depo 01/05/12	
28-2	J. Dyson Check - Void Copy (Bates Range: 082930)	FR Depo 01/05/12	
28-3	Anthem Remittance Voucher - D.Bollware (Bates Range: 083103-109)		
29	Wachovia/Wells Fargo Bank Statements, checks, deposit slips and other documentation related to the accounts of Mert T. Kivanc D.O., PC; Metro Arthritis Imaging Infusion & Associates dba Mert T. Kivanc; and Mert T. Kivanc. (Bates Ranges: 037178-037279; 037378-038266; 038652-038778; 038909-039033; 039034-039086; 039873-040085; 040090-040117; 041065-041280; 041282; 041287-041347; 041357-041440; 041441-041442; 041449-041562; 041566-041641; 041573; 041580)		
29-1	J. Dyson Check from Bank (Bates Range: 037637)	FR Depo 01/05/12	
29-2	J. Dyson Deposit Slip (Bates Range: 037629)	FR Depo 01/05/12	
29-3	D. Bollware Check from Bank (Bates Range: 037506)	FR Depo 01/05/12	
29-4	D. Bollware Deposit Slip (Bates Range: 037489)	FR Depo 01/05/12	
30	Bank Fund Staff Federal Credit Union bank statements, checks, deposit slips and other documentation related to the accounts of Mert T. Kivanc; Turan S. & Duygu Kivanc		

	(Bates Ranges: 038268-038304; 038521-038631; 039337-039395; 041850-042128; 042137; 042139-042140; 042145; 042149-042203; 042206-042207; 076938-076940; 076943-076963; 076965-076976; 076978-077008)		
31	PNC Bank statements, checks, deposit slips and other documentation related to the accounts of Turan S. Kivanc, Duygu Kivanc, Mert T. Kivanc, Tunc M. Kivanc (Bates Ranges: 042573-042577; 042580-042710; 042714-042721; 042723-042736; 042738-042768; 042772-042789; 042791-042792)		
32	Cardinal Bank statements, checks, deposit slips and other documentation related to the accounts of Mert T. Kivanc dba Metro Arthritis Imaging Infusion and Associates (MAII&A) (Bates Ranges: 036793-036798; 038639; 038641-038650)		
33	Wire transfers from Mert Kivanc's business Wachovia/Wells Fargo Bank account to HSBC Turkey during the period 11/2007 - 12/2008 (Bates Range: 082691-082698)		
34	Summary Charts 1-15 (Hard copies provided)		
35	Claimant Turan Kivanc's sworn statements filed in this case, including interrogatory responses.		

Respectfully submitted,

Neil H. MacBride
United States Attorney

By:

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of February 2012, I electronically filed the foregoing with the clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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